

**THE ROSEN LAW FIRM, P.A.**

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[Proposed] Class Counsel

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ALBERT SNELLINK, INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS SIMILARLY  
SITUATED,

Plaintiff,

vs.

UNIVERSAL TRAVEL GROUP, INC.,  
JIANGPING JIANG, YIZHAO ZHANG, JIANG  
XIE, JIDUAN YUAN, LAWRENCE LEE, and  
LIZONG WANG

Defendants.

CASE No.: 2:11-cv-2164 (KM) (MCA)

**NOTICE OF MOTION AND  
MOTION FOR (I) PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT (II) A  
PRELIMINARY DETERMINATION  
THAT CLASS TREATMENT IS  
APPROPRIATE, AND (III)  
APPROVAL OF NOTICE AND  
NOTICE PLAN**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Stipulation of Settlement and Exhibits thereto, the pleadings and records on file in this action, and other such matters and argument as the Court may consider at the hearing on this motion, Lead Plaintiffs P. Van Hove BVBA, Pascal Van Hove GCV , John Thollon, Michael Zabinski, Jean Doyle, and Mark Larosa (the “Lead Plaintiffs”) move the Court, before the Honorable Judge Kevin McNulty, United States District Judge for the United States District Court, District of New Jersey, at the Martin Luther King, Jr. Federal Building and United States Courthouse, Room 03, 50 Walnut Street, Newark, NJ 07101, at a date and time to be specified by the Court, for an order: (i) granting Preliminary Approval of the Proposed Settlement (the “Settlement”); (ii) granting conditional certification of the Settlement Class; and (iii) granting approval of the Notice to the Settlement Class. The Settling Defendants, as defined in the Stipulation, do not oppose this motion.

Dated: January 26, 2015

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Laurence M. Rosen

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**CERTIFICATE OF SERVICE**

I hereby certify that on this on January 26, 2015, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Executed on January 26, 2015

/s/ Laurence Rosen